

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re	<u><b>Marcos O. Vargas</b></u>	Case No.	<u><b>22-13239/mdc</b></u>
	Debtor	Chapter	<u><b>13</b></u>

**DEBTOR, MARCOS O. VARGAS'S RESPONSE TO MOTION FOR RELIEF  
OF U.S. BANK, AS TRUSTEE, ON BEHALF OF J.P. MORGAN ET AL**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. The averments in this paragraph are legal conclusions and no response is required.
8. Admitted.
9. Admitted in part, denied in part. It is admitted that Debtor failed to make some of his post-petition mortgage payments of January 2023 through March 2023. However, Debtor did make one of his post-petition mortgage payments.
10. Denied. The averments in this paragraph are legal conclusions and no response is required.
11. Denied. The averments in this paragraph are legal conclusions and no response is required.
12. Denied. The averments in this paragraph are legal conclusions and no response is required.
13. Denied. The averments in this paragraph are legal conclusions and no response is required.
14. Denied. The averments in this paragraph are legal conclusions and no response is required.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief from the Automatic Stay.

Dated: May 12, 2023

Respectfully submitted:

/s/Bradly E. Allen, Esquire

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United States Bankruptcy Court  
Eastern District of Pennsylvania

In re **Marcos O. Vargas**

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Case No. **22-13239/mdc**  
Chapter **13**

**ORDER**

AND NOW, This                      day of                      , 2023 upon Motion for Relief from the Automatic Stay of U.S. Bank et al and Debtor's Response it is hereby:

ORDERED that the Motion for Relief of U.S. Bank et al is denied.

BY THE COURT:

Dated: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE MAGDELINE D. COLEMAN  
United States Bankruptcy Judge